

# EXHIBIT C

**Neufeld, Courtney A.**

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**From:** Lenning, Nicholas F.  
**Sent:** Tuesday, April 11, 2023 2:11 PM  
**To:** Long, Betsy; Ghavimi, Darlene F.; Reisner, Daniel; Dacus, Deron (EXTERNAL); Benyacar, David; Boardman, Albert; Brown, Melissa; Baker, Donna; Mayers, Carolene  
**Cc:** EntropicKLG; wh@wsfirm.com; andrea@wsfirm.com  
**Subject:** RE: Entropic v. Charter: Deposition scheduling

Hi Betsy and Dan,

I'm following up on items from our meet and confer.

On Mr. Adams, we understand that our confirmation that Entropic has no interest in any prior privileged discussions with Arnold & Porter or Charter on unrelated matters, and has not so inquired, resolves Charter's objection under the protective order. Please let us know if that is incorrect and if we should discuss further.

We also discussed Ms. Quigley. Our understanding is that Charter does not intend to work with Ms. Quigley in any capacity absent a court order permitting the engagement. But we also understand that Charter has not ruled out seeking the Court's permission to engage her. We also understand that Charter may have additional questions regarding the facts, and we invite you to send those to us.

For depositions, we understand you will be providing the availability and designations for witnesses this week. We look forward to receiving that and confirming the dates. I will get back to you as soon as possible regarding the deposition of Ms. Ehret.

On discovery items:

- We understand that Charter has not searched or collected emails, and does not intend to, but is willing to consider specific categories that Entropic identifies. We discussed one particular category regarding the teams that work directly with Broadcom and the third-party manufacturers of the accused products, and we understand you will get back to us on that.
- For interrogatories 2 and 5, we understand your position to be that Charter does not have any information to supplement currently for Interrogatories 2

and 5, and will supplement if it receives any relevant documents from MaxLinear.

- On ROG 4, we understand that Charter will supplement and provide the factual information sought subject to Charter's scope and relevance objection for components (for example) it believes are not relevant to the case. Please let us know when Charter expects to be able to serve that supplement.
- And finally on ROG 1, we understand Charter will consider supplementing and get back to us.

Please let us know if any of the foregoing is incorrect, especially as to the supplementations for the interrogatories. Thank you.

Best,

Nick Lenning  
K&L Gates LLP  
(206) 370-6685  
He/Him/His

---

**From:** Lenning, Nicholas F.

**Sent:** Tuesday, April 11, 2023 7:13 AM

**To:** 'Long, Betsy' <Elizabeth.Long@arnoldporter.com>; Ghavimi, Darlene F. <Darlene.Ghavimi@klgates.com>; Reisner, Daniel <Daniel.Reisner@arnoldporter.com>; Dacus, Deron (EXTERNAL) <ddacus@dacusfirm.com>; Benyacar, David <David.Benyacar@arnoldporter.com>; Boardman, Albert <Albert.Boardman@arnoldporter.com>; Brown, Melissa <Melissa.Brown@arnoldporter.com>; Baker, Donna <donna.baker@arnoldporter.com>; Mayers, Carolene <Carolene.Mayers@arnoldporter.com>

**Cc:** EntropicKLG <EntropicKLG@klgates.com>; wh@wsfirm.com; andrea@wsfirm.com

**Subject:** RE: Entropic v. Charter: Deposition scheduling

Hi Betsy,

In advance of our meet and confer, does Charter have objections to our 30(b)(6) topics or any particular issues regarding scope that it wants to discuss? We ask that you provide that information as much in advance as possible so the call can be productive. Thank you.

Best,

Nick Lenning

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---

**From:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>  
**Sent:** Friday, April 07, 2023 5:19 AM  
**To:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>; Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>  
**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)  
**Subject:** RE: Entropic v. Charter: Deposition scheduling

**External Sender:**

Hi Nick,

We will send an invite for noon ET Tuesday.

Regarding scheduling depositions, we will begin to provide you with dates next week.

Best,  
Betsy

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Betsy Long  
Counsel | [Bio](#)

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**From:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>  
**Sent:** Thursday, April 6, 2023 3:20 PM  
**To:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>; Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; [zzz.External.ddacus@dacusfirm.com](mailto:zzz.External.ddacus@dacusfirm.com) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>  
**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [zzz.External.wh@wsfirm.com](mailto:zzz.External.wh@wsfirm.com) <[wh@wsfirm.com](mailto:wh@wsfirm.com)>; [zzz.External.andrea@wsfirm.com](mailto:zzz.External.andrea@wsfirm.com) <[andrea@wsfirm.com](mailto:andrea@wsfirm.com)>  
**Subject:** RE: Entropic v. Charter: Deposition scheduling

External E-mail

Hi Betsy,

Thank you for flagging that with the 30(b)(6) - we will review and get back to you.

For the meet and confer, let's do Tuesday at noon eastern. Does Charter expect to begin providing availability for deponents this week? If you could provide an update on that, it would be appreciated. We haven't received an indication from Charter that dates will be forthcoming and we would like to move forward with depositions in April or May. So while we very much would like to work with Charter to schedule these based on the witness's availability, these were served five weeks ago and we can't wait until Tuesday to learn that Charter does not have dates yet. Please let us know if Charter will provide dates for the noticed witnesses either before the meet and confer, or on the meet and confer, thank you.

Best,

Nick Lenning  
K&L Gates LLP  
(206) 370-6685  
He/Him/His

---

**From:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>

**Sent:** Thursday, April 06, 2023 6:10 AM

**To:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>; Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)

**Subject:** RE: Entropic v. Charter: Deposition scheduling

Hi Nick,

We are available Tuesday, 12-2 & 3-4ET, and Wednesday, 2-4ET.

Entropic's 30(b)(6) topics 89-98 are identical to 101-110. Please let us know if Entropic will withdraw one of these sets of topics.

Best,  
Betsy

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Betsy Long  
Counsel | [Bio](#)

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**From:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>

**Sent:** Wednesday, April 5, 2023 11:51 PM

**To:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>; Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; [zzz.External.ddacus@dacusfirm.com](mailto:zzz.External.ddacus@dacusfirm.com) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [zzz.External.wh@wsfirm.com](mailto:zzz.External.wh@wsfirm.com) <[wh@wsfirm.com](mailto:wh@wsfirm.com)>; [zzz.External.andrea@wsfirm.com](mailto:zzz.External.andrea@wsfirm.com) <[andrea@wsfirm.com](mailto:andrea@wsfirm.com)>

**Subject:** RE: Entropic v. Charter: Deposition scheduling

External E-mail

Hi Betsy,

Could you please let us know your availability to meet and confer on the remaining issues, including the remainder of deposition scheduling, the non-damages topics for the 30(b)(6) notice, and the discovery letters?

It now has been almost another two weeks since Charter said it wanted to work cooperatively to schedule depositions, but we have not received the availability for any witnesses. Given that over five weeks have passed since the 30(b)(1) notices were sent, we ask that Charter provide the availability for these witnesses in April or May no later than the end of this week. We also ask that Charter provide the designees for the noticed 30(b)(6) topics and April or May dates for those deponents no later than the end of next week. Further delay, however, will prejudice Entropic. If we do not receive available dates by these times, we will select dates, re-notice the depositions, and proceed on those dates.

Thank you. We hope we can work cooperatively to schedule these depositions.

Best,

Nick Lenning  
K&L Gates LLP

(206) 370-6685

He/Him/His

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**From:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>

**Sent:** Tuesday, April 04, 2023 12:23 PM

**To:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>; Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)

**Subject:** RE: Entropic v. Charter: Deposition scheduling

Hi Betsy,

I understand you'll be meeting and conferring on Friday with Darlene on the damages-specific issues. Unfortunately, I cannot join at that time due to child care issues. Could you let me know your availability to meet and confer on the remaining issues for discussion? In the meantime, if you also have an update on scheduling for depositions, that would be appreciated. Thank you.

Best,

Nick Lenning

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He/Him/His

---

**From:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>

**Sent:** Thursday, March 30, 2023 5:15 PM

**To:** Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>; Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)

**Subject:** RE: Entropic v. Charter: Deposition scheduling

Thanks, Darlene.

I just sent an invite.

Best,

Betsy

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Betsy Long  
Counsel | [Bio](#)

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---

**From:** Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>

**Sent:** Thursday, March 30, 2023 8:10 PM

**To:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>; Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; [zzz.External.ddacus@dacusfirm.com](mailto:zzz.External.ddacus@dacusfirm.com) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>

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**Subject:** RE: Entropic v. Charter: Deposition scheduling

External E-mail

Betsy,  
9CT/10ET works for us.  
Thanks,  
Darlene

---

**From:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>

**Sent:** Thursday, March 30, 2023 7:06 PM

**To:** Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>; Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)

**Subject:** RE: Entropic v. Charter: Deposition scheduling

Hi Darlene,

We are available to meet and confer Friday, April 7, between 9-11ET.

Best,  
Betsy



Betsy Long  
Counsel | [Bio](#)

## Arnold & Porter

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**From:** Ghavimi, Darlene F. <[Darlene.Ghavimi@klgates.com](mailto:Darlene.Ghavimi@klgates.com)>

**Sent:** Thursday, March 30, 2023 6:40 PM

**To:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>; Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; [zzz.External.ddacus@dacusfirm.com](mailto:zzz.External.ddacus@dacusfirm.com) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [zzz.External.wh@wsfirm.com](mailto:zzz.External.wh@wsfirm.com) <[wh@wsfirm.com](mailto:wh@wsfirm.com)>; [zzz.External.andrea@wsfirm.com](mailto:zzz.External.andrea@wsfirm.com) <[andrea@wsfirm.com](mailto:andrea@wsfirm.com)>

**Subject:** RE: Entropic v. Charter: Deposition scheduling

External E-mail

Betsy,

Could you clarify your email below - are you agreeing to meet and confer on the Rule 30(b)(6) topics next week? Or are you only agreeing to give us a date by next Friday? If the latter, that is problematic. We noticed the deposition of Charter for April 18, 2023 and are entitled to understand if Charter has any issues we cannot resolve and need to take to the Court. I propose having several conferences to each deal with a discrete set of topics. Please let me know your availability to discuss the following topics relevant to damages at a time next week: Topics 30 - 85, 100. We have already had several discussions about these categories of information in connection with Charter's document production. Each party already has a pretty good idea of the other's positions on this information and should not need extensive preparation to discuss. Entropic's Rule 30(b)(6) notice has been outstanding for 3 weeks now and Entropic's requests for documents and information for these topics has been outstanding for many months. We believe we can quickly and efficiently resolve our issues, if any, on these topics. If Charter is going to agree to provide a witness to testify on each of these topics, then please identify that person or persons and provide us available dates in the month of April.

Regards,  
Darlene

**K&L GATES**

**Darlene F. Ghavimi**  
Partner  
K&L Gates LLP  
2801 Via Fortuna

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Austin, Texas 78746-7568  
Phone: 512-482-6919  
Fax: 512-482-6859  
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**From:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>  
**Sent:** Wednesday, March 29, 2023 11:27 PM  
**To:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>  
**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)  
**Subject:** RE: Entropic v. Charter: Deposition scheduling

Thank you, Betsy, we will look out for your availability to meet and confer next week and look forward to that discussion.

Nick Lenning  
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**From:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>  
**Sent:** Wednesday, March 29, 2023 5:45 PM  
**To:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>  
**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)  
**Subject:** RE: Entropic v. Charter: Deposition scheduling

Hi Nick,

Regarding Entropic's March 20th letter to Charter, Charter will be producing documents responsive to your letter next week.

We are currently working with our client to provide you with dates and locations for the noticed deponents and we expect that they will be available in May. We will get back to you as soon as possible with proposed dates.

Regarding scheduling a meet and confer for the 30(b)(6), we would appreciate a little more time before we schedule it to allow us to be fully prepared so we can have a productive discussion. To that end, we will provide you with our availability for a meet and confer at the end of next week.

Regarding Charter's March 20th response letter to Entropic, we will be prepared to discuss that on the meet and confer as well. Additionally, we will not be able to supplement interrogatory 5 on Monday as we believe that MaxLinear possesses relevant documents. As such, we will supplement this interrogatory (1) if we receive documents from MaxLinear and (2) after we review any MaxLinear documents received.

Best,  
Betsy

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Betsy Long  
Counsel | [Bio](#)

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**From:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>

**Sent:** Tuesday, March 28, 2023 10:16 PM

**To:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>;  
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Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker,  
Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [zzz.External.wh@wsfirm.com](mailto:zzz.External.wh@wsfirm.com) <[wh@wsfirm.com](mailto:wh@wsfirm.com)>;  
[zzz.External.andrea@wsfirm.com](mailto:zzz.External.andrea@wsfirm.com) <[andrea@wsfirm.com](mailto:andrea@wsfirm.com)>

**Subject:** RE: Entropic v. Charter: Deposition scheduling

External E-mail

Hi Betsy,

Could you please let me know your availability to meet and confer this week? We see at least three items to discuss: (1) deposition scheduling; (2) Entropic's letter sent March 20th; and (3) Charter's response letter regarding interrogatories also sent March 20th. If there are additional items Charter would like to discuss, please let us know. Thank you.

Best,

Nick Lenning  
K&L Gates LLP  
(206) 370-6685

He/Him/His

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**From:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>  
**Sent:** Saturday, March 25, 2023 5:04 PM  
**To:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>  
**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)  
**Subject:** RE: Entropic v. Charter: Deposition scheduling

Thank you, Betsy. We would prefer to meet and confer this upcoming week if that is possible for your team. In the meantime, we look forward to receiving the availability and locations for the noticed deponents, and working with you to schedule these. Given the close of discovery in July and the Markman schedule in between, we believe these depositions should begin in April. But if the witnesses do not have availability in April, let us know and we can look at May. Thank you.

Best,

Nick Lenning  
K&L Gates LLP  
(206) 370-6685  
He/Him/His

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**From:** Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>  
**Sent:** Friday, March 24, 2023 3:59 PM  
**To:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>; Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>  
**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [wh@wsfirm.com](mailto:wh@wsfirm.com); [andrea@wsfirm.com](mailto:andrea@wsfirm.com)  
**Subject:** RE: Entropic v. Charter: Deposition scheduling

Hi Nick,

Thank you for the email.

We will work with you to schedule the 30(b)(1) depositions and to schedule a meet and confer on the 30(b)(6) notice and will respond substantively next week.

Best,  
Betsy

Betsy Long  
Counsel | [Bio](#)

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**From:** Lenning, Nicholas F. <[Nicholas.Lenning@klgates.com](mailto:Nicholas.Lenning@klgates.com)>

**Sent:** Thursday, March 23, 2023 10:13 PM

**To:** Reisner, Daniel <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; [zzz.External.ddacus@dacusfirm.com](mailto:zzz.External.ddacus@dacusfirm.com) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>; Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; [zzz.External.wh@wsfirm.com](mailto:zzz.External.wh@wsfirm.com) <[wh@wsfirm.com](mailto:wh@wsfirm.com)>; [zzz.External.andrea@wsfirm.com](mailto:zzz.External.andrea@wsfirm.com) <[andrea@wsfirm.com](mailto:andrea@wsfirm.com)>

**Subject:** RE: Entropic v. Charter: Deposition scheduling

External E-mail

Counsel, we have not received a response to this. The 30(b)(1) notices were served nearly a month ago, and the 30(b)(6) notice was served two weeks ago. We would like to work cooperatively with Charter to schedule these depositions based on the witnesses' availability, but if we do not receive a response from Charter, we will have no choice but to choose dates ourselves, re-notice the 30(b)(1) depositions, and proceed.

As to the 30(b)(6) deposition notice, we have received no response and thus assume Charter has no objections to the scope of the noticed topics or the dates chosen. If that is incorrect, please promptly let us know so the parties may meet and confer. Please provide Charter's designees for the topics and their availability so we may cooperatively schedule those depositions as well.

Please let us know.

Best,

Nick Lenning  
K&L Gates LLP  
(206) 370-6685  
He/Him/His

**From:** Lenning, Nicholas F.

**Sent:** Monday, March 20, 2023 8:55 AM

**To:** 'Reisner, Daniel' <[Daniel.Reisner@arnoldporter.com](mailto:Daniel.Reisner@arnoldporter.com)>; Dacus, Deron (EXTERNAL) <[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)>; Benyacar, David <[David.Benyacar@arnoldporter.com](mailto:David.Benyacar@arnoldporter.com)>; Boardman, Albert <[Albert.Boardman@arnoldporter.com](mailto:Albert.Boardman@arnoldporter.com)>; Brown, Melissa <[Melissa.Brown@arnoldporter.com](mailto:Melissa.Brown@arnoldporter.com)>; Baker, Donna <[donna.baker@arnoldporter.com](mailto:donna.baker@arnoldporter.com)>; Mayers, Carolene <[Carolene.Mayers@arnoldporter.com](mailto:Carolene.Mayers@arnoldporter.com)>; Long, Betsy <[Elizabeth.Long@arnoldporter.com](mailto:Elizabeth.Long@arnoldporter.com)>

**Cc:** EntropicKLG <[EntropicKLG@klgates.com](mailto:EntropicKLG@klgates.com)>; Wesley Hill <[wh@wsfirm.com](mailto:wh@wsfirm.com)>; 'Andrea Fair' <[andrea@wsfirm.com](mailto:andrea@wsfirm.com)>

**Subject:** Entropic v. Charter: Deposition scheduling

Counsel,

We are reaching out to schedule the depositions of Casey Paiz, Matt Petersen, and Steve Williams, as well as the Rule 30(b)(6) deposition of Charter. Please either provide available dates for these depositions (and, for the 30(b)(6), Charter's designees) or provide your availability to meet and confer. Thank you.

Best,

Nick Lenning



**Nick Lenning**

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